

1 Your Name: IBRAHIM HASSAN  
 2 Address: LAS VEGAS, NV, 89128  
 3 Phone Number: (702) 499-6701  
 4 Fax Number: \_\_\_\_\_  
 5 E-mail Address: \_\_\_\_\_  
 6 Pro Se Plaintiff

**FILED**  
**FEB 22 2019**  
 SUSAN Y. SOONG  
 CLERK, U.S. DISTRICT COURT  
 NORTH DISTRICT OF CALIFORNIA

7  
 8 UNITED STATES DISTRICT COURT  
 9 NORTHERN DISTRICT OF CALIFORNIA

**CV 19 1003**

10  
 11 IBRAHIM HASSAN

Case Number [leave blank]

12  
 13 Plaintiff,

**COMPLAINT**

14 vs.

15 FACEBOOK, INC

**DEMAND FOR JURY TRIAL**

16 1601 Willow Road

Yes ☒ No ☐

17 Menlo Park, CA 94025

18  
 19 Defendant.

**PARTIES**

- 20  
 21  
 22 1. Plaintiff. *[Write your name, address, and phone number. Add a page for additional plaintiffs.]*

23 Name: IBRAHIM HASSAN  
 24 Address: LAS VEGAS, NV, 89128  
 25 Telephone: (702) 499-6701

26  
 27  
 28  
**COMPLAINT**

PAGE 1 OF 16 *[JDC TEMPLATE - Rev. 05/2017]*

1 Your Name: ANJEZA HASSAN  
 2 Address: LAS VEGAS, NV, 89128  
 3 Phone Number: 702 677 2887  
 4 Fax Number: \_\_\_\_\_  
 5 E-mail Address: annie.sara@yahoo.com  
 6 Pro Se Plaintiff

7  
 8 UNITED STATES DISTRICT COURT  
 9 NORTHERN DISTRICT OF CALIFORNIA

10  
 11 ANJEZA HASSAN

Case Number /leave blank/

12  
 13 Plaintiff,

**COMPLAINT**

14 vs.

15 FACEBOOK, INC.

DEMAND FOR JURY TRIAL

16 1601 Willow Road

Yes ☒ No ☐

17 Menlo Park, CA 94025

18  
 19 Defendant.

20  
 21 **PARTIES**

- 22 1. Plaintiff. *[Write your name, address, and phone number. Add a page for additional plaintiffs.]*

23 Name: ANJEZA HASSAN  
 24 Address: LAS VEGAS, NV 89128  
 25 Telephone: 702 677 2887

26  
 27  
 28  
 COMPLAINT

PAGE 2 OF 16 [JDC TEMPLATE - Rev. 05/2017]

Your Name: KOSTA HYSYA  
 Address: WATERFORD, MI 48327  
 Phone Number: (248) 821-5049  
 Fax Number: \_\_\_\_\_  
 E-mail Address: kosta.hysa@yahoo.com  
 Pro Se Plaintiff

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

KOSTA HYSYA

Case Number [leave blank]

Plaintiff,

**COMPLAINT**

vs.

FACEBOOK, INC

DEMAND FOR JURY TRIAL

1601 Willow Road

Yes ☒ No ☐

Menlo Park, CA 94025

Defendant.

**PARTIES**

1. Plaintiff. *[Write your name, address, and phone number. Add a page for additional plaintiffs.]*

Name: KOSTA HYSYA  
 Address: WATERFORD, MI 48327  
 Telephone: (248) 821-5049

COMPLAINT

PAGE 3 OF 16 *[JDC TEMPLATE - Rev. 05/2017]*

1 Your Name: MIRELA HYSA  
 2 Address: LAS VEGAS, NV 89128  
 3 Phone Number: (702) 493- 2545  
 4 Fax Number:  
 5 E-mail Address: m.hysa@yahoo.com  
 6 Pro Se Plaintiff  
 7

8 UNITED STATES DISTRICT COURT  
 9 NORTHERN DISTRICT OF CALIFORNIA  
 10

11 MIRELA HYSA  
 12

Case Number /leave blank/

13 Plaintiff,

**COMPLAINT**

14 vs.

15 FACEBOOK, INC

DEMAND FOR JURY TRIAL

16 1601 Willow Road

Yes ☒ No ☐

17 Menlo Park, CA 94025  
 18

19 Defendant.  
 20

**PARTIES**

- 21 1. Plaintiff. *[Write your name, address, and phone number. Add a page for additional*  
 22 *plaintiffs.]*

23 Name: MIRELA HYSA  
 24 Address: LAS VEGAS, NV 89128  
 25 Telephone: (702) 493-2545  
 26  
 27  
 28

COMPLAINT

PAGE 4 OF 16 *[JDC TEMPLATE - Rev. 05/2017]*



2. Defendants. *[Write each defendant's full name, address, and phone number.]*

Defendant 1:

Name: FACEBOOK, INC.

Address: 1601 Willow Road, Menlo Park, CA 94025

Telephone: 1833 272 0777

Defendant 2:

Name: \_\_\_\_\_

Address: \_\_\_\_\_

Telephone: \_\_\_\_\_

Defendant 3:

Name: \_\_\_\_\_

Address: \_\_\_\_\_

Telephone: \_\_\_\_\_

### JURISDICTION

*[Usually only two types of cases can be filed in federal court, cases involving "federal questions" and cases involving "diversity of citizenship." Check at least one box.]*

3. My case belongs in federal court



under federal question jurisdiction because it involves a federal law or right.

*[Which federal law or right is involved?]* The Federal Trade Commission Act



under diversity jurisdiction because none of the plaintiffs live in the same state as any of the defendants and the amount of damages is more than \$75,000.

COMPLAINT

PAGE 5 OF 16 *[JDC TEMPLATE - Rev. 05/2017]*

**VENUE**

*[The counties in this District are: Alameda, Contra Costa, Del Norte, Humboldt, Lake, Marin, Mendocino, Monterey, Napa, San Benito, Santa Clara, Santa Cruz, San Francisco, San Mateo, or Sonoma. If one of the venue options below applies to your case, this District Court is the correct place to file your lawsuit. Check the box for each venue option that applies.]*

4. Venue is appropriate in this Court because:

- ☒ a substantial part of the events I am suing about happened in this district.
- ☐ a substantial part of the property I am suing about is located in this district.
- ☐ I am suing the U.S. government, federal agency, or federal official in his or her official capacity and I live in this district.
- ☒ at least one defendant is located in this District and any other defendants are located in California.

**INTRADISTRICT ASSIGNMENT**

*[This District has three divisions: (1) San Francisco/Oakland (2) San Jose; and (3) Eureka. First write in the county in which the events you are suing about happened, and then match it to the correct division. The San Francisco/Oakland division covers Alameda, Contra Costa, Marin, Napa, San Francisco, San Mateo, and Sonoma counties. The San Jose division covers Monterey, San Benito, Santa Clara, Santa Cruz counties. The Eureka division covers Del Norte, Humboldt, Lake, Mendocino counties, only if all parties consent to a magistrate judge.]*

5. Because this lawsuit arose in San Mateo County, it should be assigned to the San Francisco/Oakland Division of this Court.

**STATEMENT OF FACTS**

*[Write a short and simple description of the facts of your case. Include basic details such as where the events happened, when things happened and who was involved. Put each fact into a separate, numbered paragraph, starting with paragraph number 6. Use more pages as needed.]*

For our Class Action Complaint, Plaintiffs Ibrahim Hassan, Anjeza Hassan, Kosta Hysa, and Mirela Hysa, on behalf of ourselves allege the following against Defendant Facebook, Inc ("Facebook"). Facebook collected personal data and information from us the Plaintiffs promising that its safe and secure. Facebook exposed and sold our personal data to third parties without our authorization for monetary profit.

COMPLAINT

PAGE 6 OF 16 [JDC TEMPLATE - Rev. 05/2017]



1 Facebook's Terms of Service and Privacy promises and represents to us "user  
2 that: "you have control over who sees what you share on Facebook". Facebook promises  
3 and represents that: "We have top-rate security measures in place to help protect you and  
4 your data when you use Facebook". Facebook promises and represents that:" Your activity  
5 (messages) is encrypted, people can't access without your permission.

6 1 Facebook promises and represents that:  
7 " When it comes to your personal information, we don't share it without your permission  
8 (unless required by law)". Facebook promises and represents that: " Facebook gives people  
9 control over what they share, who they share it with, the content they see and the  
10 experience, and whom can contact them".

11 2 We, the Plaintiffs reasonably relied on Facebook's representations and  
12 promises for the security of our data in using Facebook and posting on Facebook.  
13 Facebook failed to live up to the commitments. Facebook allowed more than 150 companies  
14 to override Facebook consumers' privacy settings and access the information without  
15 our knowledge or consent.

16 3 Plaintiff Ibrahim Hassan ("Ibrahim") opened his Facebook account on or  
17 about February 2007, also used Messenger ( "A Facebook product"). Ibrahim stopped  
18 using his Facebook account on or about December 2016 after believing that Facebook  
19 did not honor its agreement to protect all the collected personal data from Ibrahim.  
20 Ibrahim's Facebook account is still active but Ibrahim stopped log in and sharing activities.

21 4 Plaintiff Anjeza Hassan ("Anjeza") has Facebook account since February 2009  
22 uses Messenger ( "A Facebook product" ) making calls and messages. Facebook has  
23 collected, tracked, and maintained personal data such as: name, phone number, email,  
24 birthday, gender, hometown, education, work experience, relationship status, political and  
25 religious views, photographs, messages, passwords, bank accounts, credit cards (from

26 //

27 //

28 COMPLAINT

PAGE 7 OF 16 [JDC TEMPLATE – Rev. 05/2017]

[Copy this page and insert it where you need additional space.]

4 purchases made as stated per Facebook agreement). All the above information data that Facebook collected are used and shared by Facebook to third parties without Anjezas authorization for its own monetary benefits.

5 Plaintiff Kosta Hysa ("Kosta") has a Facebook account since April 2008 and uses Messenger (A Facebook product) making calls and sending and receiving messages. Facebook has collected, tracked, and maintained personal activities and data such as: name, phone number, email, birthday, gender, hometown, education, work experience, relationship status, personal messages, personal photographs, calls, and activities. All the above information have been exposed by Facebook without consent.

6 Plaintiff Mirela Hysa ("Mirela") opened her Facebook account on or about June 2008 and also uses Messenger to make calls and send and receive messages. Facebook has collected, tracked, and maintained personal activities and data such as: name, email, password, birthday, personal photographs, messages, calls, contacts. All of the above personal data but not limited to the unknown data have been exposed on the Dark Web and other unauthorized companies by Facebook.

7 On August 5th, 2018 Mirela received an email notification from "Creditwise" (A credit monitoring company) that Mirela's email m.hysa@yahoo.com (Mirela's email used to log in on Facebook) was found on Dark Web on May 04, 2018, and her password has been exposed.

8 The Dark Web is notorious for hosting marketplaces selling illegal items such as: weapons, drugs, and personal data. Dark web is a heavily encrypted part of the Internet that makes it difficult for the authorities to detect the location or owners of the website.

COMPLAINT

PAGE 8 OF 16 [JDC TEMPLATE - 05/17]



*[Copy this page and insert it where you need additional space.]*

9 Personal information is very valuable on the black market, and it can be used to harm us "Plaintiffs" through blackmail, harassment, embarrassment in person or online, or to commit other types of fraud including obtaining ID cards, or drivers license, accessing bank accounts, fraudulently obtaining tax returns and refunds, and obtaining government benefits. The fact that identity thieves will wait years before attempting to use the personal data collected, we "Plaintiffs" will need to remain vigilant and in high risks for years to come.

10 Facebook without authorization, exposed all the above data collected from all four Plaintiffs for its own financial gain. Based on all publicity, media, current and previous news articles, investigations, former employees it clearly shows the actual intention of Facebook's purpose. Facebook sells all personal data collected (currently over two billion users) for its monetary gain through lax and non-existent data safety and security policies and protocol.

11 On September 28, 2018 Facebook announced the data breach wherein the personal data of 50 million users were exposed due to a flaw in Facebook's code that allowed hackers to take over users accounts for illegal purposes.

12 On or about December 18, 2018 the New York Times based its reporting on more than 270 pages of internal Facebook documents and interviews with more than 50 former employees of Facebook and its so-called integration partners, as well as other former

13 government officials and privacy advocated stating that: "Facebook for many years gave more than 150 companies extensive access to personal data-including private messages and contact information without users' explicit consent. Facebook allowed Microsoft's Bing search engine to see the names of virtually all of Facebook users' friends without consent, and it gave Netflix, Spotify and Royal Bank of Canada access to read, write and delete users' private messages".

14 Trusting Facebook's representation and terms of agreement we the Plaintiffs shared "very" personal, intimate, secure information through messaging, calling, and texting using Messenger (A Facebook product). Private information such as but not limited to:

1 [Copy this page and insert it where you need additional space.]

2 12. current addresses, social security numbers, birthdays, driver licenses, personal  
3 and intimate pictures, personal and intimate conversations, and life-making decisions.  
4  
5  
6  
7

8 13. Facebook allowing access and exposing our personal data, personal  
9 information, personal messages brings us the Plaintiffs at a high risk of our lives and  
10 security. Knowing that more than 150 companies and their employees have all of our  
11 private information keeps us under harm and fear not just for our lives but our children.  
12 Privacy is our fundamental right.  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28



**CLAIMS****First Claim**

(Name the law or right violated: THE FEDERAL TRADE COMMISSION ACT)

(Name the defendants who violated it: FACEBOOK INC.)

[Explain briefly here what the law is, what each defendant did to violate it, and how you were harmed. You do not need to make legal arguments. You can refer back to your statement of facts.]

14 The Federal Trade Commission Act is the primary statute of the Commission. Under this Act the Commission is empowered, among other things, to prevent unfair methods of competition and unfair or deceptive acts or practices in or affecting commerce, are hereby declared unlawful.

15 In addition, The Federal Trade Commission Act is also considered a measure that protects privacy, as it allows the FTC to penalize companies that violate their own policies through false advertising and other actions that can harm the consumers.

16 Facebook falsely represented to us "Plaintiffs" that our personal data were secured and private. Defendant knew or should have known it did not employ reasonable, industry standard, and appropriate security measures that complied "with federal regulations" and that would have kept our personal information secure and no misuse.

17 Defendant also violated the Federal Trade Commission Act by failing to implement reasonable and appropriate security measures or follow industry standards for data security, and failing to comply with its own posted privacy policies.

18 On or about April 2018, Facebook disclosed to its consumers that their personal information have been harvested and sold to Cambridge Analytica ( a political consulting firm). Over fifty million users were affected by it. Facebook allows third-party partners to have access to our personal information but is not able to protect and police its

//

COMPLAINT

PAGE 11 OF 16 [JDC TEMPLATE - 05/17]



[Copy this page and insert it where you need additional space.]

18. own privacy policies. Facebook allowed over 150 companies to access and use our personal data for its own monetary profits, without our permission and consent.

We, the Plaintiffs are in danger of our everyday lives as a result of our personal data and information being exposed by Facebook to the known and unknown people and companies that are holding everything that we are made of.

19. Defendant's acts, omissions, and misrepresentations as alleged herein are unlawful and in violation of The Federal Trade Commission Act, as a result of Facebook failing to comply with its own posted privacy policies. Misusing our private and personal information for its own monetary profits.

20. As a result of Defendant's unlawful business practices, violations of its own policies, we the Plaintiffs are entitled to restitution, disgorgement of wrongfully obtained profits and injunctive relief ( as stated per Demand of Relief).

Second Claim

(Name the law or right violated: Invasion of Privacy)

(Name the defendants who violated it: FACEBOOK INC.)

21. One of the Privacy Laws of the United States is the Invasion of Privacy.

Invasion of Privacy is the intrusion into the personal life of another. It encompasses internet privacy, data collecting, and other means of disseminating private information.

22. Public Disclosure of Private Facts is one of the types of Invasion of Privacy.

Public disclosure of private facts laws protect our right to keep the details of our private life from becoming public information.

23. Facebook states in its "Help Center" under viewing messages that: "Only you and the people you are in a conversation with can see your messages." This is misleading and false representation, as Facebook has shared and gave access to other companies such as Netflix, Spotify, and Royal Bank of Canada to read, write, and delete users' private messages without users consent. Facebook collected, tracked, and maintained our personal information as stated in paragraphs 3-6 but not limited to our activities on Facebook and Messenger. Facebook exposed our privacy, personal information, personal messages, and personal activities to known and unknown companies without consent.

24. On or about October 24, 2018 Facebook Chief Privacy Officer Erin Egan stated at the 40th International Conference of Data Protection and Privacy Commissioners in Brussels that: "Privacy is a fundamental right because it goes to the heart of what it means to be a human being; to live a life of freedom and dignity."

25. These statements are misleading and false representation. Facebook has taken our privacy and sold it for its own monetary profits. With that Facebook has taken away the right of us to be human being, to live with freedom and dignity.

Facebook has intruded into our personal life and made it public without consent.



Third \_\_\_\_\_ Claim

(Name the law or right violated: Breach of Contract)

(Name the defendants who violated it: FACEBOOK INC)

26 Facebook's policies and practices relating to third party accesss and use of our data have been violated by Facebook by allowing more than 150 companies to access and use our personal data for their own monetary gain. Facebook failed to comply with its own user agreement knowing that is misusing our personal information.

27 Facebook misrepresented the extend to which it protects our personal data. Facebook failed to adequately disclose to Facebook consumers that our data can be access without our knowledge or affirmative consent by third-party applications and override consumer privacy settings.

28 Facebook permitted select partner companies such as, but not limited to, Netflix, Spotify, Royal Bank of Canada, Cambridge Analytica, special access to its consume data for financial gain. Facebook's disclosures about third-party access were ambiguous, misleading, deceptive and Facebook failed to conduct oversight and enforcement.

29 Facebook claims that does not sell our data. This is a misrepresentation since Facebook does sell access to our data without our consent and the limit of data use. Facebook has proven over and over again that it prioritizes its own product agenda and financial gain over the safety and privacy of its users.

30 We the Plaintiffs relied on Facebook's promises and agreement to protect our personal information, personal data, pictures, messages, conversations as stated per our agreement.

31 Facebook intentionally failed to comply with its own policies and regulations stated in the agreement as it used our "the users" trust, personal and private information, for its own financial gain without considering the risk, loss, security, exploitation of our lives.



**DEMAND FOR RELIEF**

*[State what you want the Court to do. Depending on your claims, you may ask the Court to award you money or order the defendant to do something or stop doing something. If you are asking for money, you can say how much you are asking for and why you should get that amount, or describe the different kinds of harm caused by the defendant.]*

32. We, "Plaintiffs" repeat, reallege, and incorporate by reference the allegations contained in paragraphs 1 through 31 as though fully stated herein. As the result of, but not limited to, Defendant's unlawful business practice, violation of privacy, breach of contract of our personal data that we relied, trusted, and provided to Defendant, we the "Plaintiffs" respectfully request this Court to grant relief against Defendant Facebook Inc as followed:  
Order the Defendant to pay restitution in the amount of \$5,000,000,000 ( five million) dollars in sum. The sum to be awarded to the Plaintiffs individually in the amount of \$1,250,000,000 to each Plaintiff to cover all losses, risks, current and future damages caused by the Defendant Facebook.

**DEMAND FOR JURY TRIAL**

*[Check this box if you want your case to be decided by a jury, instead of a judge, if allowed.]*

☒ Plaintiff demands a jury trial on all issues.

Respectfully submitted,

Date: 02/21/2019

Sign Name:

Print Name:

IBRAHIM HASSAN

[Copy this page and insert it where you need additional space.]

Sign Name:

Print Name: ANJEZA HASSAN

Sign Name:

Print Name: KOSTA HYSA

Sing Name:

Print Name: MIRELA HYSA

COMPLAINT

PAGE 16 OF 16 [JDC TEMPLATE - 05/17]